

Exhibit 6

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY : SUBPOENA IN A CIVIL CASE
AVERAGE WHOLESALE PRICE : MDL NO. 1456
LITIGATION :
: Civil Action No. 01-12257-PBS
: :
: Judge Patti B. Saris
THIS DOCUMENT RELATES TO THE : (case pending in D. Mass.)
CONSOLIDATED CLASS ACTION :
:

NON-PARTY NATIONAL HERITAGE INSURANCE COMPANY'S
OBJECTIONS TO SUBPOENA

Pursuant to Rule 45(c)(2)(B) of the Federal Rules of Civil Procedure, non-party National Heritage Insurance Company, Inc. ("National Heritage Insurance Company") submits the following objections to the subpoena dated October 27, 2005 ("Subpoena"), which was served in the above-captioned case on National Heritage Insurance Company on or about October 27, 2005 and to the subpoena dated October 28, 2005 requesting the production of witnesses to testify at a deposition pursuant to Rule 30(b)(6) (Testimony Subpoena), which subpoena was served on or about October 28, 2005. While asserting the following objections, National Heritage Insurance Company reserves the right to assert additional objections and limitations with respect to the two Subpoenas as National Heritage Insurance Company may deem necessary or appropriate as developments warrant.

OBJECTIONS

National Heritage Insurance Company makes the following general objections to the Subpoenas, and to the individual requests contained therein.

1. National Heritage Insurance Company objects to the Subpoena as a whole on the grounds that each and every request is burdensome, oppressive, and does not comply with the admonition of Fed. R. Civ. P. 45(c)(1) that a subpoena to non-parties "avoid imposing undue burden or expense on a person subject to that subpoena."
2. National Heritage Insurance Company objects to the Subpoena on the grounds that each and every request is overly broad and unduly burdensome to the extent that they require National Heritage Insurance Company to search all of its records in Massachusetts and inquire of employees in Massachusetts and California to discern what documents are available and are recoverable.
3. National Heritage Insurance Company objects to the Subpoena on the grounds that it seeks documents and information available through public sources, including, without limitation, the internet.
4. National Heritage Insurance Company objects to the production of documents that contain commercial, trade secret, or other confidential information of National Heritage Insurance Company. National Heritage Insurance Company objects that the plaintiffs have

not shown a substantial need for such material and that any such need cannot be met by National Heritage Insurance Company without undue hardship.

5 National Heritage Insurance Company objects to the Subpoena on the whole on the grounds that each and every request appears to seek documents that are not relevant or reasonably calculated to lead to the discovery of admissible evidence.

6. National Heritage Insurance Company objects to the Subpoena to the extent it requests a deposition of persons who are not a party or an officer of a party to travel more than 100 miles to testify at a deposition, in violation of Fed. R. Civ. Pr. 45(c)(3)(A).

Dated: November 9, 2005, Hartford, Connecticut.

**NON-PARTY
NATIONAL HERITAGE INSURANCE COMPANY**

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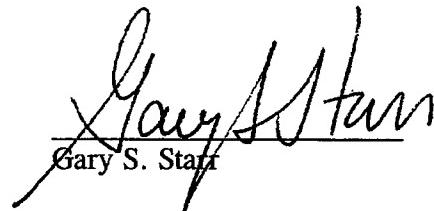
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Its Attorneys

CERTIFICATION

This is to certify that a copy of the foregoing Non-party National Heritage Insurance Company, Inc.'s Objections to Subpoena has been sent via facsimile, electronic transmission and certified mail, return receipt requested on this 9th day of November 2005 to:

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